

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THEIR MOTION IN
LIMINE NO. 25 AND WAYMO'S BRIEF
IN OPPOSITION THERETO)**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants' Administrative Motion to File Under
7 Seal Portions of their Motion in Limine No. 25 and Waymo's Brief in Opposition Thereto (the
8 "Administrative Motion"). The Administrative Motion seeks an order sealing the highlighted portions
9 of Defendants' Motion in Limine No. 25 ("Defendants' Motion") and Exhibits 17, 18, and 27 thereto,
10 Waymo's Response to Defendants' Motion in Limine No. 25 ("Waymo' Response"), and Exhibit 3 to
11 the Declaration of Jeff Nardinelli, as well as the entirety of Exhibits 11 and 19-21 to Defendants'
12 Motion.

13 3. Defendants' Motion (green highlighted portions), Exhibits 17-19 thereto (red
14 highlighted portions), and Exhibit 27 thereto (green highlighted portions in version filed herewith),
15 Waymo's Opposition (green highlighted portions), and Exhibit 3 to the declaration of Jeff Nardinelli
16 (green highlighted portions), as well as the entirety of Exhibits 11 and 21 to Defendant's Motion,
17 contain, reference, and/or describe Waymo's trade secret information. The information Waymo seeks
18 to seal includes the confidential design and functionality of Waymo's proprietary autonomous vehicle
19 system, including its LiDAR designs, which Waymo maintains as secret. I understand that these
20 designs are maintained as secret by Waymo (Dkt. 25-47) and that the designs are valuable to
21 Waymo's business (Dkt. 25-31). The public disclosure of this information would give Waymo's
22 competitors access to descriptions of the functionality or features of Waymo's autonomous vehicle
23 system. If such information were made public, I understand that Waymo's competitive standing
24 would be significantly harmed.

25 4. Waymo's request to seal is narrowly tailored to those portions of Defendants' Motion
26 and Exhibits 11, 17-19, 21, and 27 thereto, as well as the portions of Waymo's Opposition and Exhibit
27 3 to the Declaration of Jeff Nardinelli that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on September 18, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC
7

8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.
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12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven
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